

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

CAMBRIDGE RETIREMENT SYSTEM, on  
Behalf of Itself and all Others Similarly  
Situated,

Plaintiff,

v.

INVACARE CORPORATION, *et. al.*,

Defendants.

Case No. 1:13-cv-1165-CAB

CLASS ACTION

**SUPPLEMENTAL EXHIBIT TO DECLARATION OF CAMBRIDGE  
RETIREMENT SYSTEM, EXHIBIT A TO RESPONSE  
TO THE COURT'S AUGUST 28, 2013 ORDER TO SHOW CAUSE**

# **EXHIBIT A**

Wire: Market Wire (MWR) Date: May 24 2013 17:30:00  
Bernstein Litowitz Berger & Grossmann LLP Announces Securities Class Action Suit  
Filed Against Invacare Corporation and Certain

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BN 05/24 17:33 \*INVACARE NAMED IN HOLDER SUIT, LAW FIRM SAYS :IVC US  
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Bernstein Litowitz Berger & Grossmann LLP Announces Securities Class Action  
Suit Filed Against Invacare Corporation and Certain of Its  
Senior Executives

NEW YORK, NY -- (Marketwired) -- 05/24/13 -- Bernstein Litowitz  
Berger & Grossmann LLP ("BLB&G") today announced that it has filed a  
securities class action lawsuit on behalf of its client Cambridge  
Retirement System ("Cambridge") against Invacare Corporation  
("Invacare" or the "Company") (NYSE: IVC) and certain of its senior  
executives. The action, which is captioned Cambridge Retirement  
System v. Invacare Corporation, et al., No. 1:13-cv-01165 (N.D.  
Ohio), asserts claims under the Securities Exchange Act of 1934  
("Exchange Act") on behalf of investors in Invacare common stock  
during the period of July 22, 2010 through December 7, 2011 (the  
"Class Period").

The Complaint alleges that during the Class Period, Invacare and  
certain of its senior executives violated provisions of the Exchange  
Act by issuing false and misleading press releases, financial  
statements, filings with the Securities and Exchange Commission  
("SEC"), and statements during investor conference calls. As alleged  
in the Complaint, Invacare and certain of its senior executives  
misled investors regarding Invacare's noncompliance with Food and  
Drug Administration ("FDA") guidelines and Current Good Manufacturing  
Practices ("CGMP"), and masked the fact that the Company suffered  
from widespread operational, quality, and regulatory deficiencies.  
Specifically, the Company concealed from investors that it received a  
series of warnings from the FDA -- known as Forms 483 -- which  
identified serious compliance violations at its two major United  
States-based manufacturing facilities.

After repeatedly failing to remedy these violations, the Company  
received a Warning Letter from the FDA, which the FDA released to the  
public on January 4, 2011. The Warning Letter identified a litany of  
CGMP violations and "recurring" consumer complaints concerning the  
safety of Invacare's medical beds, including incidents of death  
caused by entrapment and fire. In the Warning Letter, the FDA  
reprimanded Invacare for failing to take preventative action,  
document and evaluate serious complaints and complete risk  
assessments to ensure the safety of its products. Disclosure of the  
Warning Letter caused Invacare stock to drop \$1.38 per share, or 4.5  
percent, to close at \$29.29 per share.

Over the next several months, Defendants continued to downplay the  
scope and significance of Invacare's compliance issues, despite its  
receipt of two additional Forms 483 in August 2011, which were also  
concealed from investors. On December 8, 2011, however, Invacare  
shocked investors by issuing a press release announcing that the FDA  
intended to enter a consent decree, which would require the  
suspension of certain operations until the Company's manufacturing  
facilities became compliant with FDA regulations. News of Invacare's  
systemic quality and regulatory deficiencies, which could take many  
months to remediate and impact Invacare's revenue and growth, caused  
the Company stock to plummet \$5.88 per share, or 28.6 percent, to  
close at \$14.70 per share, wiping out over \$180 million in market  
capitalization.

If you wish to serve as lead plaintiff for the Class, you must file a motion with the Court no later than 60 days from today. Accordingly, the deadline for filing a motion for appointment as lead plaintiff is July 23, 2013. Any member of the proposed class may move the Court to serve as lead plaintiff through counsel of their choice, or may choose to do nothing and remain a member of the proposed class.

Cambridge Retirement System is represented by BLB&G, a firm of over 100 attorneys with offices in New York, California, Louisiana, and Illinois. If you wish to discuss this Action or have any questions concerning this notice or your rights or interests, please contact Avi Josefson of BLB&G at 212-554-1493, or via e-mail at [avi@blbglaw.com](mailto:avi@blbglaw.com).

Since its founding in 1983, BLB&G has built an international reputation for excellence and integrity. Specializing in securities fraud, corporate governance, shareholders' rights, employment discrimination, and civil rights litigation, among other practice areas, BLB&G prosecutes class and private actions on behalf of institutional and individual clients worldwide. Unique among its peers, BLB&G has obtained several of the largest and most significant securities recoveries in history, recovering billions of dollars on behalf of defrauded investors. More information about BLB&G can be found online at [www.blbglaw.com](http://www.blbglaw.com).

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-0- May/24/2013 21:30 GMT

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##### END OF STORY 1 #####

Dated: September 5, 2013

Respectfully submitted,

/s/ Benjamin Galdston

BENJAMIN GALDSTON

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically this 5th day of September, 2013. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Benjamin Galdston

Benjamin Galdston